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Attorneys for Defendant  
JOEL GIL-SANDOVAL

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,	)	Case No. 2:23-cr-00095-JAM
Plaintiff,	)	
vs.	)	<b>STIPULATION AND ORDER TO CONTINUE</b>
	)	<b>STATUS CONFERENCE AND EXCLUDE TIME</b>
JESUS VASQUEZ and	)	Date: July 11, 2023
JOEL GIL-SANDOVAL,	)	Time: 9:00 a.m.
	)	Judge: Hon. John A. Mendez
Defendants.	)	

IT IS HEREBY STIPULATED and agreed by and between United States Attorney Phillip A. Talbert, through Assistant United States Attorney Kerry Blackburn, counsel for Plaintiff; Attorney Jennifer Mouzis, counsel for Defendant Jesus Vasquez; and Kyle Knapp, counsel for Joel Gil-Sandoval that the status hearing currently set for July 11, 2023 at 9:00 be continued to **October 31, 2023, at 9:00 a.m.**

The parties specifically stipulate as follows:

1. By previous order, this matter was set for a status on July 11, 2023 at 9:00 a.m.
2. By stipulation, Mr. Gil-Sandoval now moves to continue the status conference to October 31, 2023, at 9:00 a.m.
3. To date, the government has produced approximately 106 pages of discovery relating to the defendants. There will also be substantial supplemental discovery forthcoming subject to a protective order.
4. Mr. Vasquez and Mr. Gil-Sandoval require additional time to review the

discovery, investigate and research possible defenses, research potential pretrial motions, and explore potential resolutions to the case, and otherwise prepare for trial.

5. Mr. Vasquez and Mr. Gil-Sandoval believe that failure to grant the requested continuance would deny them the reasonable time necessary for effective preparation, taking into account the exercise of due diligence.
6. Neither the government nor Mr. Vasquez object to the continuance.
7. For the purpose of computing time under 18 U.S.C. § 3161 *et seq.* (Speedy Trial Act), the parties request that the time period between July 5, 2023 and October 31, 2023, inclusive, be deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(B)(iv) (Local Code T4), because it would result from a continuance granted by the Court at the defense's request, based on a finding that the ends of justice served by granting the continuance outweighs the best interest of the public, Mr. Vasquez, and Mr. Gil-Sandoval in a speedy trial.

Respectfully submitted,

Date: July 5, 2023

/s/ Jennifer Mouzis  
JENNIFER MOUZIS  
Attorney for Mr. Vasquez

Date: July 5, 2023

/s/ Kyle Knapp  
Kyle Knapp  
Attorney for Mr. Gil-Sandoval

Date: July 5, 2023

PHILLIP A. TALBERT  
United States Attorney

/s/ Kerry Blackburn  
Kerry Blackburn  
Assistant United States Attorney  
Attorneys for Plaintiff

**ORDER**

The Court, having received and considered the parties' stipulation, and good cause appearing therefrom, **ADOPTS** the parties' stipulation in its entirety as its order.

IT IS SO ORDERED.

Dated: July 05, 2023

/s/ John A. Mendez

THE HONORABLE JOHN A. MENDEZ  
SENIOR UNITED STATES DISTRICT JUDGE